

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	
)	
U LOCK INC.)	BANKRUPTCY NO. 22-20823-GLT
)	
DEBTOR)	CHAPTER 7
*****)	
CHRISTINE BIROS)	DOCUMENT NO.
)	
MOVANT)	
)	
vs.)	
)	
SHANNI SNYDER)	
)	
RESPONDENT)	

TRUSTEE'S RESPONSE TO DEBTOR U LOCK'S NOTICE OF NON-COMPLIANCE

AND NOW, comes Robert H. Slone, Trustee, by and through his attorneys, Mahady and Mahady—Robert H. Slone, Esquire, and files this Response to Debtor U Lock's Notice of Non-Compliance, stating as follows:

1. Paragraph 13 alleges that equipment was used to damage scheduled property belonging to U Lock, Inc., including destroying equipment, damaging a trailer and destroying an unused tank. In the bankruptcy schedules filed in this case, the only tank listed was a 20- pound propane tank with a value of \$20.00. The propane tank was listed on Schedule A/B at item number 22. Four (4) trailers with no specifics with a total value of \$2,000.00 are listed on Schedule A/B at item number 50. Paragraph 13 does not indicate which trailer may have been damaged or what specific damage there was to said trailer and strict proof thereof is requested.
2. The letter from North Huntingdon stating that "all work must cease and desist immediately and may not resume until a grading plan and permit application for review and approval of the Township" will be addressed by Christine Biros through her attorneys.

Respectfully submitted,

Dated: July 25, 2022

/S/ ROBERT H. SLONE
Robert H. Slone, Esquire
PA I.D. No. 19963
MAHADY & MAHADY
223 South Maple Avenue
Greensburg, PA 15601
(724) 834-2990
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**CERTIFICATE OF SERVICE FOR TRUSTEE'S RESPONSE TO
DEBTOR U LOCK'S NOTICE OF NON-COMPLIANCE**

I certify under penalty of perjury that I served the above captioned pleading(s) on the parties at the addresses specified below on July 25, 2022 by the following:

Service by First-Class Mail:

Office of the U.S. Trustee
Liberty Center, Suite 970
1001 Liberty Avenue
Pittsburgh, PA 15222

Sarah Wenrich, Esquire
Bernstein Berkley
707 Grant Street
Suite 2200 Gulf Tower
Pittsburgh, PA 15219

J. Allen Roth, Esquire
805 S. Alexandria Street
Latrobe, PA 15650

Law Firm of William E. Otto
PO Box 701
Murrysville, PA 15668

EXECUTED ON: July 25, 2022

By: /s/ ROBERT H. SLONE
Robert H. Slone, Esquire
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